



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Review of Magnitude of the Residue Bridging Trials in Support of a "Me-Too" Application for a 25% WP formulation (water soluble packets) of cyfluthrin.

FROM: Debra Edwards, Ph.D. Acting Director
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Oct. 6, 2002

TO: George LaRocca, PM 13
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Bayer Corp. (April 19, 2002 letter from Gregory C. Mattern) has submitted magnitude of the residue bridging trials to support registration of a "me-too" cyfluthrin product (20% WP/water soluble packet; EPA file No. 3125-LIT) on carrots, peppers, potatoes, radishes, sweet corn, tomatoes, citrus, hops, and alfalfa. The bridging trials provide side-by-side harvest (PHI) and decline residue data for several commodities listed on the currently registered 25% EC label (EPA Reg. No. 3125-351) and on the proposed label for the 20% WP. Application rates and PHIs are equivalent on both labels, with the exception of tomatoes and peppers for which the PHI has been increased from 0 to 7 days on the new (WP) label.

Side-by-side residue trials were provided for several commodities, as follows:

commodity	# of trials	location of trials	MRID No.
Carrots	3	IN, CA	456613-03
Peppers	4	FL, TX, CA	456558-16
Potatoes	3	OH, WA, ID	456613-04
Radishes	3	FL, IN	456613-03
Tomatoes	2	FL, CA	456558-16
Grapefruit	3	CA, AZ	456613-02
Lemons	3	CA, AZ	456613-02
Oranges	3	CA, AZ	456613-02

Broccoli	3	OR, CA	456511-01
Cabbage	3	PA, NE, GA	456511-01

The current application does not include a proposal for registration of the WP on broccoli or cabbage. However, since no bridging trials were submitted for sweet corn, hops, or alfalfa, the data were reviewed to provide a broader perspective on residue comparisons between the two formulations. A full review of the data for broccoli and cabbage can be found in a recent memo by Yan Donovan (Health Effects Division/OPP), dated August 20, 2002 (addendum to memo of July 26, 2002).

A comparison of residues in the submitted bridging studies clearly indicates that residue levels resulting from use of the 20% WP formulation will be similar or, in most cases, lower than those resulting from use of the 25% EC. Further, due to the diverse range of commodities tested and the consistency in results, no additional/specific bridging data are needed to support use of the 20% WP on sweet corn, hops or alfalfa. Thus, existing tolerances and dietary risk assessments are applicable to the new formulations (20% WP; EPA File No. 3125-LIT).

Please feel free to contact me if you have an questions on this action (703-305-5447).

